

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JAMES A. WILSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 05-399-JJF
	)	
STANLEY TAYLOR, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS  
DIRECTED TO PLAINTIFF RODERICK BROWN**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants, through their undersigned counsel, hereby serve on Plaintiff, Roderick Brown, the following Requests for Production of Documents and Things.

**INSTRUCTIONS**

A. If any document or thing required to answer any Request for Production is withheld because you claim that such information is privileged or is contained in a privileged document or communication:

- (1) identify each such document with sufficient specificity to permit a court to determine the propriety of the asserted privilege and setting forth the nature of the document;
- (2) identify the privilege and set forth the factual basis for the privilege claims; and
- (3) set forth each Request to which each such document or thing is responsive.

B. These Requests for Production are continuing in nature and, if applicable, will require supplemental responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:**

1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in your Complaint, including, but not limited to, all grievances or complaints submitted by you to Department of Correction personnel, responses thereto, and any related correspondence between you and Department of Correction personnel.

**REQUEST NO. 2:**

2. All correspondence relating to, regarding or arising out of the incidents alleged in your Complaint, including, but not limited to, any correspondence between you and your friends or family members or other inmates and Department of Correction personnel.

**REQUEST NO. 3:**

3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in your Complaint and any statements, declarations, or affidavits of Plaintiffs, other inmates, or witnesses to the allegations in the Complaint.

**REQUEST NO. 4:**

4. All of your medical records relating to, regarding or arising out of the incidents alleged in your Complaint.

**REQUEST NO. 5:**

5. All of your medical records for the past 15 years.

**REQUEST NO. 6:**

6. All of your criminal history records from any other State besides Delaware for the

past 15 years.

**REQUEST NO. 7:**

7. All documents requested to be identified or referenced in your Response to Defendants' First Set of Interrogatories, served contemporaneously herewith.

**DEPARTMENT OF JUSTICE  
STATE OF DELAWARE**

/s/ Stacey Xarhoulakos  
Stacey Xarhoulakos (I.D. 4667)  
Deputy Attorney General  
Department of Justice  
820 N. French St., 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400  
stacey.xarhoulakos@state.de.us  
Attorney for Defendants

Dated: March 9, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2007, I electronically filed *Defendants' Request for Production of Documents and Things Directed to Plaintiff Roderick Brown* with the Clerk of Court using CM/ECF. I hereby certify that on March 9, 2007, I have mailed by United States Postal Service, the document to the following non-registered party:

Roderick Brown  
SBI #315954  
SCI  
PO Box 500  
Georgetown, DE 19947

/s/ Stacey Xarhoulakos  
Stacey Xarhoulakos (I.D. 4667)  
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